

DEPARTMENT OF WORKFORCE DEVELOPMENT
DIVISION OF WORKFORCE SOLUTIONS
ADMINISTRATOR'S MEMO SERIES

☐ ACTION
☒ NOTICE 06-15

ISSUE DATE: 09/14/2006
DISPOSAL DATE: 12-31-2009

*PROGRAM CATEGORIES:

<input type="checkbox"/> AS	<input type="checkbox"/> FM	<input type="checkbox"/> ML	<input type="checkbox"/> TR
<input type="checkbox"/> CC	<input type="checkbox"/> FL	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> W-2
<input type="checkbox"/> CS	<input type="checkbox"/> IT	<input type="checkbox"/> RA	<input type="checkbox"/> WIA
<input type="checkbox"/> CF	<input type="checkbox"/> JC	<input type="checkbox"/> TC	
<input type="checkbox"/> CR	<input type="checkbox"/> LM	<input type="checkbox"/> TA	

To: Wisconsin Works (W-2) Agency Directors

From: Bill Clingan /s/
Division Administrator

RE: Changes to the W-2 Program Resulting from Temporary Assistance for Needy Families (TANF) Reauthorization

PURPOSE:

The purpose of this memo is to:

1. Provide W-2 agency directors with an overview of how the W-2 program will change as a result of TANF Reauthorization. Specific policy and CARES changes will be communicated to agencies through a series of Operations Memos planned for release over the next several months. The content of those Operations Memos are discussed in this memo.
2. Information on upcoming training required for W-2 staff.

BACKGROUND:

The Federal TANF legislation was reauthorized as part of the Deficit Reduction Act of 2005 (DRA). The legislation extends TANF Block Grant funding at the current level through September 30, 2010. The provision for the Caseload Reduction Credit was amended to adjust the base year from 1995 to 2005 resulting in a lower caseload reduction credit in Wisconsin beginning in Federal Fiscal Year 2007.

The legislation did not change the Federal work participation rates or the 12 Federal categories of work activities. However, it did direct the Federal Department of Health and Human Services (HHS) to develop new regulations that define each of the 12 Federal work activities and to require states to establish and maintain work participation verification procedures with internal controls to ensure compliance with these procedures.

* PROGRAM CATEGORIES:

AS--Apprenticeship Standards	FM--Financial Management Requirements	ML--Migrant Labor	TR--Transportation
CC--Child Care	FL--Foreign Labor Certification	NA--Native American Services	W-2--Wisconsin Works
CS--Child Support	IT--IT Systems	RA--Refugee Assistance	WIA--Workforce Investment Act
CF--Children First	JC--Job Center	TC--Tax Credit Programs	
CR--Civil Rights	LM--Labor Market Information	TA--Trade Assistance	

The Federal Interim Regulations were publicly released on June 29, 2006, and become effective October 1, 2006. States are expected to begin implementing changes on that date. However, there is recognition that States need time to appropriately plan for and make adjustments to policies, procedures and information systems, in order to meet the requirements to establish and maintain work participation verification procedures with internal controls to ensure compliance with these procedures, therefore, no penalties will be imposed by HHS for failing to implement these new requirements until October 1, 2007. Wisconsin is moving forward in a prudent manner, taking time to consult with various stakeholders to gather input, and discuss options internally, before implementing needed changes. As a result, changes will be implemented incrementally, with the first changes becoming effective October 1, 2006.

States must however, meet the new definitions of work and adjusted work participation rate effective October 1, 2006.

POLICY AND PROCEDURE:

No dramatic shifts in W-2 policy or program philosophy are anticipated. Our emphasis continues to be on engaging participants in work and training activities to the fullest extent possible. W-2 activities are to serve the purpose of helping individuals overcome employment barriers and develop the skills needed to become gainfully employed. However, agencies will need to examine a number of their current procedures to adjust to new requirements.

The regulatory changes impact the W-2 program in four primary ways:

1. W-2 CARES Activities, which are defined in the CARES Guide, were reviewed and some of the activities were revised for two purposes: 1) To better align the CARES activities definitions with the new Federal work activity definitions; and 2) To enable the Department to accurately report work participation information. Although some of the definitions have changed, there will not be a significant impact on how case workers enter CARES Activities in CARES.
2. With the shift in how the TANF Caseload Reduction Credit is calculated, the two-parent participation rate will be more challenging for Wisconsin to meet. As a result, we have made some adjustments to both Two-parent policy and to the new Two-Parent CARES screen, WPTP. These changes will likely reduce the number of W-2 cases that are defined as a two-parent case and will provide caseworkers with more accurate information to use when assigning hours of participation for two-parent cases.
3. Based on the requirements laid out in the Interim Federal Regulations, agencies will be responsible for ensuring that attendance information for all assigned W-2 activities is verified and documented in each W-2 participant's case file. CARES entries (i.e., assigned hours, non-participation and good case) must match the attendance documentation in the case file. In addition to the new verification requirements, agencies must ensure that all activities are supervised.
4. The Department will be required to report to HHS on W-2 participants' progress in educational activities (i.e., adult basic education, English-as-a-Second-Language, Literacy Training, GED, HSED, and High School). Although there will be no new policy requirements related to educational progress, it will require that some additional information be obtained by the caseworker and entered in CARES.

Operations Memos

A series of Operations Memos are planned for release over the course of the next several months that will cover changes in policy and procedure.

In September three Operations Memos will be released that will cover the following:

1. Changes to W-2 Activity Definitions will be covered along with a reiteration of current CARES requirements on use of the <Scheduled Hours> and <Actual Hours> fields on WPCS and WPCH.
2. New instructions will be provided on entering non-participation on CARES screen WPNP and use of three new Good Cause reasons.
3. Changes in two-parent policy will be covered along with anticipated CARES changes for screen WPTP.

Three additional Operations Memos are planned for release in the coming months that will include the following:

1. New W-2 agency procedures will be described for verifying the actual hours of participation for each W-2 activity, including the procedures for obtaining and maintaining documentation of hours of participation. This memo will also cover methods of supervising W-2 activities and procedures for projecting assigned hours (on WPCS) for individuals who are in unsubsidized employment.
2. New CARES instructions will be provided for tracking progress in educational activities.
3. New CARES instructions will be provided for additional enhancements being made to screen WPTP.

Training

DWD/DWS/BW-2 Partner Training Services will present Potential Impacts on W-2 of TANF Reauthorization in September 2006. This two-hour WisLine Web course will be repeated four times over four days and will be archived for viewing for two weeks thereafter. Training on this topic will be mandatory for staff impacted by changes in W-2 policy and procedure, including but not limited to FEPs, Case Managers in JDPA, CMA and SSI/SSDI Advocacy, Subcontract Staff, including those who track participant attendance, Resource Specialists and Line Supervisors.

Dates and times for the WisLine Web classes are scheduled for:

- September 21, Thursday, 1:00 p.m. to 3:00 p.m.
- September 22, Friday, 9:30 a.m. to 11:30 a.m.
- September 25, Monday, 2:30 p.m. to 4:30 p.m.
- September 26, Tuesday, 1:00 p.m. to 3:00 p.m.

While it is understood that agencies will have more than one person attending a class, each agency will only be able to use one phone line and computer connection per session. For more information regarding this, please review the information that will be included with the confirmation letter.

Registration information for Potential Impacts on W-2 of TANF Reauthorization can be found at the Learning Center, located on the web at <http://www.uwosh.edu/ccdet/wss/>.

CONTACT: DWS Regional Administrators